

January 29, 1996

EA 95-265

Mr. Michael J. Wallace  
Vice President and Chief  
Nuclear Officer  
Commonwealth Edison Company  
Executive Towers West III  
1400 Opus Place, Suite 300  
Downers Grove, IL 60515

SUBJECT: BRAIDWOOD STATION - UNIT 1  
NOTICE OF VIOLATION  
(NRC INSPECTION REPORT NO. 50-456/95016(DRP))

Dear Mr. Wallace:

This refers to the inspection conducted on October 23 through November 21, 1995, at Braidwood Station, Unit 1. The purpose of the inspection was to review the circumstances surrounding your identification during a surveillance test on October 19, 1995, that both Unit 1 diesel generators had been inoperable since October 3, 1995. The report documenting the inspection was sent to you by letter dated December 11, 1995. A predecisional enforcement conference was conducted on December 21, 1995, and the report documenting the conference was sent to you by letter dated January 9, 1996.

Based on the information developed during the inspection and the information that you provided during the conference, and a Licensee Event Report dated November 20, 1995, the NRC has determined that violations of NRC requirements occurred. The violations are cited in the enclosed Notice of Violation and the circumstances surrounding them are described in detail in the subject inspection report.

On October 2, 1995, the 1B diesel generator output breaker was racked in following safety injection system surveillance testing. The breaker was a 4160V Westinghouse Type DHP air circuit breaker and was not functionally tested after it was racked in. On October 3, 1995, with Unit 1 in Mode 5, the 1A diesel generator was taken out of service for scheduled maintenance which rendered it incapable of being readily returned to service. On October 19, 1995, with the 1A diesel still out of service and Unit 1 in Mode 6, the 1B diesel generator output breaker failed to close during the performance of the 1B diesel generator monthly operability surveillance. The operations staff determined that the breaker chassis was not fully racked into the switchgear cubicle, which rendered the 1B diesel inoperable since October 2, 1995. As a result, with Unit 1 in Modes 5 and 6 for refueling, both Unit 1 diesel generators were inoperable for about 16 days during which core alterations, positive reactivity changes, movements of irradiated fuel, and crane operation with loads over the spent fuel pool occurred.

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The primary root cause of the failure of the breaker to close was an excessively worn levering-in device. However, there were a number of significant missed opportunities to prevent the event. A lack of questioning attitude was evident by the operators' failure to document their observations that the Type DHP breakers had become more difficult to rack in, and that breaker chassis and switchgear cubicle frame misalignments had become more frequent. The maintenance procedure for the Type DHP breakers did not require complete removal of the levering-in device which was necessary for an adequate inspection, and the operations racking-in procedure did not incorporate all of the vendor guidance for ensuring that a breaker is fully engaged. Finally, there were previous breaker malfunctions at both the Braidwood and Byron stations. The applicable vendor correspondence should have resulted in more extensive inspection and engineering rigor that if performed, could have prevented this equipment failure.

Your evaluation determined that the unavailability of both diesel generators did have potential safety significance because it resulted in an increase in the probability of losing capability to remove decay heat from the shutdown reactor. The violations represent a significant failure to comply with the action statement for a Technical Specification limiting condition for operation where the appropriate action was not taken within the required time. Therefore, these violations have been categorized in the aggregate in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600, as a Severity Level III problem.

In accordance with the Enforcement Policy, a base civil penalty in the amount of \$50,000 is considered for a Severity Level III problem. Because your facility has been the subject of escalated enforcement actions within the last 2 years<sup>1</sup>, the NRC considered whether credit was warranted for *Identification* and *Corrective Action* in accordance with the civil penalty assessment process in Section VI.B.2 of the Enforcement Policy. Although there were a number of prior opportunities to identify the violations, credit was warranted because you identified the violations as a result of surveillance testing.

Credit was also warranted for your comprehensive corrective actions. Your immediate corrective actions included closing the 1B diesel generator output breaker, verifying that other ESF breakers were racked-in, and replacing the worn levering-in device for the 1B diesel generator output breaker. Specific long term corrective actions in response to the event include scheduling replacement of all levering-in devices with the upgraded version, enhancing the inspection procedure for the levering-in device, enhancing the rack-in procedure by adding additional verifying acceptance criteria, and implementing functional testing for all ESF breakers after racking-in.

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<sup>1</sup> A Severity Level III problem (identified on November 11, 1994) was issued on January 25, 1995 (EA 94-261); and a Severity Level III problem (identified on February 15, 1995) and \$100,000 civil penalty was issued on May 2, 1995 (EA 95-041).

We also acknowledge your ongoing long term actions which include reinforcing expectations for a questioning attitude, continuing and expanding seminars on the use of design basis knowledge to facilitate operator communication of equipment condition to system engineers, interviewing operator and engineering personnel for identification of material conditions that could affect plant operation, and communicating operator expectations regarding the need to notify management of any instance in which repetitive action was needed to accomplish an intended goal.

Additionally, a Material Condition Improvement Plan has been adopted, a Performance Centered Maintenance program is being developed, and peer groups comprised of system engineers from Commonwealth Edison stations and the corporate office have been established. The peer groups are system specific, component specific, and process oriented and will share information on problems at each site, formulate positions on generic issues, and implement lessons learned.

Therefore, to encourage identification and comprehensive corrective correction of violations, I have been authorized, after consultation with the Director, Office of Enforcement, not to propose a civil penalty in this case. However, significant violations in the future could result in a civil penalty.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. In addition, in view of the root causes of this event, please discuss the specific actions you have taken to assure that other significant undiscovered equipment deficiencies do not exist at the Braidwood Station. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

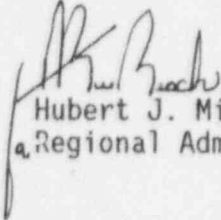
In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response will be placed in the NRC Public Document Room (PDR). To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction.

M. Wallace

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The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

Sincerely,

  
Hubert J. Miller  
Regional Administrator

Docket No. 50-456  
License No. NPF-72

Enclosure: Notice of Violation

cc w/encl: K. Kaup, Site Vice President  
J. C. Brons, Vice President,  
Nuclear Support  
T. Tulon, Station Manager  
K. Bartes, Regulatory  
Assurance Supervisor  
D. Farrar, Nuclear Regulatory  
Services Manager  
Richard Hubbard  
Nathan Schloss, Economist,  
Office of the Attorney General  
State Liaison Officer  
Chairman, Illinois Commerce  
Commission

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